

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH
CAROLINA WESTERN DIVISION

No. 5:21-CV-00225-BO

JUDITH KNECHTGES,

Plaintiff,

v.

NC DEPARTMENT OF PUBLIC
SAFETY, et al.,

Defendants.

)
)
)
)
)
)
)
)
)
)
)

**DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

NOW COMES Defendants, NC Department of Public Safety, Eric Hooks, Janet Thomas and Terri Catlett ("Defendants") appearing by and through undersigned counsel, pursuant to Rule 56 of the Federal Rules of Civil Procedure, and moves for summary judgment in their favor on the grounds that there is no genuine issue as to any material fact and Defendants are entitled to judgment as a matter of law.

In support of this Motion, Defendants rely upon its memoranda of law, the pleadings, exhibits, declarations and the statement of material facts filed contemporaneously with this Motion, and the Memorandum in Support of this Motion.

WHEREFORE, based upon the above and the arguments and authorities set forth in Defendants' Memorandum of Law, Defendants respectfully request that this Court allow this Motion for Summary Judgment, and dismiss all claims against them.

This the 17th day of May 2023.

JOSHUA H. STEIN
ATTORNEY GENERAL

/s/ Bryan G. Nichols
Bryan G. Nichols
Assistant Attorney General
N.C. State Bar No. 42008
N.C. Department of Justice
P.O. Box 629
Raleigh, North Carolina
27602-0629
Telephone: (919) 716-6568
Facsimile: (919) 716-6761
E-mail: bnichols@ncdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that, on this date, I electronically filed the foregoing **Motion for Summary Judgment** with the Clerk of the Court utilizing the CM/ECF system which will provide electronic notification to Plaintiff's counsel of record as follows:

Valerie Bateman
New South Law Firm, P.C.
209 Lloyd Street, Suite 350
Carrboro, NC 27510
valerie@newsouthlawfirm.com

This the 17th day of May, 2023.

/s/ Bryan G. Nichols
Bryan G. Nichols
Assistant Attorney General